

Melanie L. Cyganowski, Esq.
Jennifer S. Feeney, Esq.
OTTERBOURG P.C.
230 Park Avenue
New York, New York 10169
Telephone: (212) 661-9100
Facsimile: (212) 682-6104

*Co-Counsel to the Ad Hoc Committee of
Governmental and Other Contingent
Litigation Claimants*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
In re : Chapter 11
: :
PURDUE PHARMA L.P., *et al.*, : Case No. 19-23649 (RDD)
: :
Debtors¹. : (Jointly Administered)
----- X

**THIRTIETH MONTHLY FEE STATEMENT OF OTTERBOURG P.C. FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED AS CO-COUNSEL OF THE AD HOC
COMMITTEE'S PROFESSIONALS FOR THE PERIOD OF
MARCH 1, 2022 THROUGH AND INCLUDING MARCH 31, 2022**

Name of Applicant:	Otterbourg P.C.
Applicant's Role in Case:	Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants
Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:	December 2, 2019, [dkt. no. 553]

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Period for Which Compensation is Sought:	March 1, 2022 – March 31, 2022
Total Amount of Fees Incurred:	\$93,608.00
Total Fees Requested (80%):	\$74,886.40
Total Reimbursement of Expenses Incurred:	\$1,129.95
Total Reimbursement of Expenses Requested (100%):	\$1,129.95
Total compensation and Reimbursement Requested in this Statement:	\$76,016.35
This is Applicant's:	Thirtieth Monthly Fee Statement

Pursuant to the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee's Professionals*, dated December 2, 2019 [Dkt. No. 553] (the “Fee Assumption Order”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals*, dated December 21, 2019 [Dkt. No. 529] (the “Interim Compensation Order”), Otterbourg P.C. (the “Applicant”), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants in the above-captioned case, hereby submits this Thirtieth Monthly Fee Statement (the “Fee Statement”) for the period of March 1, 2022 through and including March 31, 2022 (the “Statement Period”).

Itemization of Services Rendered and Disbursements Incurred

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Statement Period with respect to each of the project categories. As reflected in Exhibit A, Applicant incurred \$93,608.00 in fees during the Statement Period. Pursuant to this Fee Statement, Applicant seeks reimbursement for 80% of such fees, totaling \$74,886.40.

2. Annexed hereto as **Exhibit B** is a chart of Applicant's professionals and paraprofessionals, including the standard hourly rate for each attorney and paraprofessional who rendered services in connection with these chapter 11 cases during the Statement Period and the title, hourly rate, aggregate hours worked and the amount of fees earned by each professional. The blended hourly billing rate of attorneys for all services provided during the Statement Period is \$1,220.30². The Blended hourly rate of all paraprofessionals is \$345.00³. A copy of the computer-generated time entries reflecting the time recorded, organized in project billing categories by Applicant is attached hereto as **Exhibit C**.

3. Annexed hereto as **Exhibit D** is a chart of necessary and out-of-pocket expenses incurred by the Applicant in the amount of \$1,220.30 in connection with providing professional services during the Statement Period. A copy of the computer-generated list of expenses is attached hereto as **Exhibit E**.

4. Applicant, to the best of its knowledge, has not included any fees in connection with or relating to the allocation of value among the Debtors' creditors.

Notice

5. Applicant will provide notice of this Fee Statement in accordance with the Interim Compensation Order.

WHEREFORE, Applicant, in connection with services rendered as co-counsel to the ad hoc committee of governmental and other contingent litigation claimants, respectfully requests (i) compensation in the amount of \$74,886.40, which is equal to 80% of the total amount of reasonable compensation for actual, necessary legal services that Applicant incurred in

² The blended hourly billing rate of \$1,220.30 is derived by dividing the total fees for attorneys of \$92,987.00 by the total hours of 76.2.

³ The Blended hourly billing rate of \$345.00 for paraprofessionals is similarly derived by dividing the total fees for paraprofessionals of \$621.00 by the total hours of 1.8.

connection with such services during the Statement Period (*i.e.*, \$93,608.00) and (ii) payment of \$1,129.95 for actual, necessary expenses that Applicant incurred in connection with such services during the Statement Period.

Dated: May 16, 2022
New York, New York

OTTERBOURG P.C.

By: /s/ Melanie L. Cyganowski
Melanie L. Cyganowski, Esq.
Jennifer S. Feeney, Esq.
230 Park Avenue
New York, New York 10169
Telephone: (212) 661-9100
Facsimile: (212) 682-6104

*Co-Counsel to the Ad Hoc Committee of
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EXHIBIT A

Fees By Project Category

**SUMMARY OF COMPENSATION BY PROJECT CODE
FOR THE STATEMENT PERIOD**

Project Code	Project Category	Total Hours	Total Fees
PU06	Employment and Fee Applications	6.9	\$5,474.50
PU08	Litigation: Contest Matters, Adversary	1.1	\$1,299.00
PU09	Meetings and Communications w/ AHC	14.0	\$17,506.00
PU11	Plan & Disclosure Statement	56.0	\$69,328.50
	TOTALS:	78.0	\$93,608.00

EXHIBIT B

Professional and Paraprofessional Fees

**SUMMARY OF HOURS BILLED BY PROFESSIONALS AND PARAPROFESSIONALS
FOR THE STATEMENT PERIOD**

Professional	Year Admitted	Rate Per Hour	No. of Hrs.	Total Compensation
Melanie L. Cyganowski ("MLC") Partner	1982	\$1400.00	40.3	\$59,241.00
Jennifer S. Feeney ("JSF") Of Counsel	1998	\$895.00	35.9	\$33,746.00
Jessica K. Hildebrandt ("JKH") Paralegal	N/A	\$325.00	1.8	\$621.00
	TOTAL		78.0	\$93,608.00

EXHIBIT C

Time Detail

OTTERBOURG P.C.

230 PARK AVENUE
NEW YORK, NY 10169-0075

Client/Matter No.: 20186/0002
Matter Name: CHAPTER 11
Billing Partner: RL STEHL

April 28, 2022
BILL NO. 223201

For Services Rendered Through March 31, 2022:

Phase: PU06		EMPLOYMENT & FEE APPLICATIONS		
<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	
			<u>AMOUNT</u>	
03/09/22	JSF	Prepare Legal Papers Preparation of Interim Fee Application	.70	658.00
03/10/22	JSF	Prepare Legal Papers Prepare Seventh Interim Fee Application	1.80	1,692.00
03/11/22	JSF	Prepare Legal Papers Prepare Seventh Interim Fee Application	1.10	1,034.00
03/11/22	JKH	Prepare Papers Prepare fee application	.60	207.00
03/13/22	JSF	Examine Documents Review of February Time Detail	.30	282.00
03/14/22	JSF	Prepare Legal Papers Draft Interim Fee Application	.80	752.00
03/15/22	JSF	Examine Documents Review of February Monthly Fee Statement	.20	188.00

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<u>ATTORNEY</u>	<u>DATE</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
JKH	03/15/22	Prepare Papers Prepare draft monthly statement	.60	207.00
JKH	03/16/22	Prepare Papers Edit and finalize fee application	.30	103.50
JKH	03/16/22	Prepare Papers Finalize February statement	.20	69.00
JSF	03/17/22	Examine Documents Review of Interim Fee Application for Filing	.30	282.00
		TOTAL PHASE PU06	6.90	\$5,474.50

Phase: PU08 LITIGATION: CONTESTED MATTERS, ADVERSARY

<u>ATTORNEY</u>	<u>DATE</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
JSF	03/17/22	Correspondence E-Mail with Gilbert Firm re: Document Production Inquiry	.20	188.00
JSF	03/23/22	Telephone Call(s) Attend Omnibus Hearing re: Continuation of Injunction and Funding Agreement	.40	376.00

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<u>ATTORNEY</u>	<u>DATE</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
MLC	03/29/22	Conference call(s) Conference call with insurance co-counsel	.50	735.00
		TOTAL PHASE PU08	1.10	\$1,299.00

Phase: PU09		MEETINGS & COMMUNICATIONS W/ AD HOC		
<u>ATTORNEY</u>	<u>DATE</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
MLC	03/01/22	Conference call(s) Conference call with AHC and co-counsel	1.20	1,764.00
JSF	03/02/22	Telephone Call(s) Attend via Zoom Weekly AHC Update Meeting	1.50	1,410.00
MLC	03/02/22	Correspondence Correspondence with AHC leadership and co-counsel	.60	882.00
JSF	03/04/22	Telephone Call(s) Participate in Meeting with Working Group of States re: Settlement	.70	658.00
JSF	03/04/22	Telephone Call(s) Attend Zoom Meeting of AHC re: Settlement Term Sheet and AHC Response	1.60	1,504.00

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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/04/22	MLC	Conference call(s) AHC working group call	.80	1,176.00
03/07/22	JSF	Telephone Call(s) Attend Zoom AHC Meeting to Discuss Supplemental Settlement and AHC Position	1.20	1,128.00
03/07/22	MLC	Conference call(s) AHC meeting	1.10	1,617.00
03/09/22	MLC	Telephone Call(s) Co-counsel call with State Leadership to prepare for hearing	2.00	2,940.00
03/10/22	JSF	Telephone Call(s) Attend Call with Co-Counsel and Certain States re: Court Hearing and Next Steps	.30	282.00
03/10/22	MLC	Conference call(s) Conference call with AHC co-counsel and state leadership	.40	588.00
03/15/22	MLC	Conference call(s) Conference call with States' leadership and AHC co-counsel	.50	735.00
03/22/22	MLC	Conference call(s) Conference call with state leadership on AHC and counsel	.60	882.00

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<u>ATTORNEY</u>	<u>DATE</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
JSF	03/23/22	Telephone Call(s) Attend Weekly Update Meeting with AHC	.50	470.00
MLC	03/23/22	Conference call(s) Attended AHC meeting	.50	735.00
MLC	03/29/22	Conference call(s) Conference call with state leadership and co-counsel for AHC	.50	735.00
		TOTAL PHASE PU09	14.00	\$17,506.00

Phase: PU11		PLAN & DISCLOSURE STATEMENT		
<u>ATTORNEY</u>	<u>DATE</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
MLC	03/01/22	Review Documents Review of draft motion re: mediation process	1.40	2,058.00
JSF	03/02/22	Examine Documents Review of Terms of Settlement Proposal	.40	376.00
JSF	03/03/22	Examine Documents Review of Mediator's Report and Settlement Term Sheet	1.10	1,034.00

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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/03/22	JSF	Telephone Call(s) Attend Co-Counsel and Executive Committee Call re: Settlement Updates	.70	658.00
03/03/22	JSF	Examine Documents Review of Florida's Objection to Settlement Term Sheet	.30	282.00
03/03/22	MLC	Review Documents Review of motion to approve settlement with nine states/DC and Sacklers	1.80	2,646.00
03/03/22	MLC	Correspondence Correspondence with AHC State Leadership re: settlement	.80	1,176.00
03/03/22	MLC	Review Documents Review of summary of mediation term sheet	.90	1,323.00
03/04/22	JSF	Telephone Call(s) Participate in Status Conference re: Settlement Terms	.70	658.00
03/04/22	JSF	Examine Documents Review of Objections to Settlement Term Sheet	1.10	1,034.00
03/04/22	MLC	Review Documents Review of Florida objection and joinders	2.10	3,087.00

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<u>ATTORNEY</u>	<u>DATE</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
JSF	03/06/22	Memo Memo Summary of Supplemental Term Sheet	1.80	1,692.00
JSF	03/06/22	Examine Documents Review of Supplemental Settlement Term Sheet	1.20	1,128.00
MLC	03/06/22	Review Documents Review of draft AHC settlement objection memo	1.10	1,617.00
JSF	03/07/22	Examine Documents Review Draft of AHC Limited Objection to Supplemental Settlement	1.10	1,034.00
JSF	03/07/22	Memo Memo Summary of Supplemental Term Sheet	1.30	1,222.00
JSF	03/07/22	Memo Prepare Summary of Objections to Supplemental Term Sheet	2.40	2,256.00
JSF	03/07/22	Examine Documents Review of Additional Objections and Joinders to Term Sheet	.80	752.00
MLC	03/07/22	Telephone Call(s) Telephone call with Ken Eckstein re: hearing	.50	735.00

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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/07/22	MLC	Review Documents Reviewed and revised draft of AHC limited opposition to settlement	1.10	1,617.00
03/07/22	MLC	Revision of Documents Reviewed and revised draft of limited opposition to settlement	1.30	1,911.00
03/07/22	MLC	Review Documents Reviewed opposition filed against settlement by various parties	1.20	1,764.00
03/08/22	JSF	Memo Review and Summarize Further Objections to Settlement Term Sheet, Including AHC Objection	3.60	3,384.00
03/08/22	JSF	Examine Documents Review of Updates from Executive Committee and Counsel re: Supplemental Term Sheet and Objections in Advance of Hearing	.40	376.00
03/08/22	MLC	Correspondence Correspondence with Ken Eckstein to prepare for hearing	.60	882.00
03/08/22	MLC	Review Documents Review of and analysis of opposition by States to proposed settlement	1.60	2,352.00

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<u>ATTORNEY</u>	<u>DATE</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
JSF	03/09/22	Telephone Call(s) Participate in Zoom with Co-Counsel and Lead States re: Preparation for Hearing	1.70	1,598.00
JSF	03/09/22	Examine Documents Review of Debtor's and UCC's Responses to Objections to Supplemental Settlement with Nine	.50	470.00
JSF	03/09/22	Telephone Call(s) Attend Via Conference Hearing on Settlement Agreement with Nine (partial)	3.20	3,008.00
MLC	03/09/22	Prepare for Argument Prepared for hearing	1.70	2,499.00
MLC	03/09/22	Attendance at Court Hearing and decision	4.90	7,203.00
JSF	03/13/22	Examine Documents Review of Summary of Appellee Briefs Filed in Second Circuit	.30	282.00
MLC	03/18/22	Correspondence Correspondence with Aaron Cahn re: recent court decision	.40	588.00
MLC	03/18/22	Review Documents Review of various filings before Second Circuit	.80	1,176.00

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<u>ATTORNEY</u>	<u>DATE</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
	03/21/22	Review Documents MLC Review of amicus briefs filed before the Second Circuit	1.70	2,499.00
	03/21/22	Review Documents MLC Review of various opposition briefs filed before the Second Circuit	1.30	1,911.00
	03/21/22	Revision of Documents MLC Reviewed and revised draft of proposed AHC filing before the Second Circuit	1.40	2,058.00
	03/22/22	Review Documents MLC Review of comments to draft AHC brief	.30	441.00
	03/22/22	Diary & Docket JKH Review docket and calendar date for oral argument	.10	34.50
	03/23/22	Examine Documents JSF Review of Amicus Briefs in Support of Appellees	.30	282.00
	03/23/22	Attendance at Court MLC Hearing before court (by zoom)	.50	735.00
	03/24/22	Review Documents MLC Review of draft of reply in Second Circuit	1.40	2,058.00

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<u>ATTORNEY</u>	<u>DATE</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
	03/25/22	Correspondence MLC Correspondence with co-counsel and state leadership re: mediation by debtors with various parties	.60	882.00
	03/28/22	Examine Documents JSF Review of Appellees' Briefs to Second Circuit	1.40	1,316.00
	03/28/22	Review Documents MLC Review of appellate papers filed with Second Circuit	2.20	3,234.00
		TOTAL PHASE PU11	56.00	\$69,328.50
			TOTAL FOR SERVICES	\$93,608.00

EXHIBIT D

Summary of Actual and Necessary Expenses

**SUMMARY OF ACTUAL AND NECESSARY DISBURSEMENTS FOR THE
STATEMENT PERIOD**

Expense Category	Total Expenses
Litigation Services ¹	\$1,129.95
TOTAL:	\$1,129.95

¹ These expenses were incurred in connection with the utilization of a third party vendor to assist Applicant with document discovery in the ongoing insurance litigation.

EXHIBIT E

Expense Detail

OTTERBOURG P.C.

230 PARK AVENUE
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April 28, 2022
BILL NO. 223201

DISBURSEMENTS FOR YOUR ACCOUNT

Litigation Support Vendors	1,129.95
TOTAL DISBURSEMENTS	1,129.95